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February 1, 2000

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FEDERAL COMPARIMENTIONS COMMISSIONS
OFFICE OF THE SECRETARY

**VIA COURIER** 

Magalie Roman Salas, Esq. Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: NOTICE OF EX PARTE MEETING

CC Docket No. 94-102 RM-8143

Compatibility with Enhanced 911 Emergency Calling Systems

Dear Ms. Salas:

On January 31, 2001, George Marble, Vice President, Marketing, Grayson Wireless Division of Allen Telecom Inc. ("Allen") and I had an *ex parte* meeting with representatives of the Wireless Telecommunications Bureau ("Bureau") regarding the above-referenced docket. Representing the Bureau were Kris A. Monteith, Chief, Policy Division, Blaise A. Scinto, Deputy Chief, Policy Division, Daniel F. Grosh, Senior Attorney, Policy Division, and William D. Lane, Chief Technologist for the Bureau.

We updated the Bureau regarding recent developments concerning Allen's Geometrix® network-based wireless E-911 Phase II location system. We discussed the status of field trials, and indicated that the Geometrix® system is currently in production. Allen has sufficient production capacity and installation capability to support multiple large-scale system implementations in time to meet the Commission's Phase II deadlines. Geometrix® is currently capable of operating with all handsets using the AMPS, CDMA, TDMA and iDEN air interfaces.

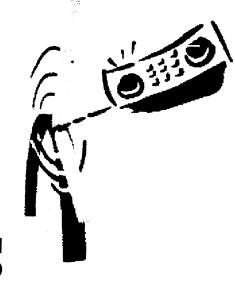
We explained that Geometrix® is in the process of being enhanced to support location determination for GSM users. Allen has targeted Geometrix® GSM capability to be available for demonstration by early second quarter 2001, and Allen expects general availability of Geometrix® GSM capability in the second quarter of 2001. Allen intends for the GSM enhancement to be available in new Geometrix® systems and as a software download to Geometrix® systems already installed.

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# Grayson Wireless Division

Federal Cornrnunications Commission E911 Phase II Readiness Update January 31, 2001





Network-Overlay Location System for E911 Phase II

Field-Trialed in Multiple Carrier Networks

Live Demonstrations to Many Carriers

- CDMA, TDMA, AMPS, iDEN
- Cellular, PCS, SMR Frequencies
- Differential GPS Provides Reference in All Demos

Marketed to All Wireless Carrier Segments

- Mentioned by All Segments in 11/9/00 Filings

In Production in Grayson Wireless Plant in Virginia



Geometrix Being Enhanced to Support GSM

GSM Availability Scheduled for Second Quarter 2001

Will Use Identical Location Methods (TDOA, TDOA/AOA, Proprietary Processing) for GSM as for Other Air Interfaces

Grayson Wireless Capitalizing on its Experience With GSM in Other Product Lines

Software-Intensive Design of Geometrix Permits Rapid Time-to-Market for GSM Support



Will Complete Geometrix® Support of All Wireless Air Interfaces Used in U.S.

Provided via Software Application on Geometrix Systems

- No Hardware Changes or Additions
- To Be Provided With New Geometrix Systems or as Update to Deployed Systems

Same Geometrix Hardware Will Simultaneously Support All Air Interfaces

Planned GSM Availability Supports Phase II Implementation Targets







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# GRAYSON WIRELESS ENHANCING GEOMETRIX® WIRELESS LOCATION SYSTEM WITH E911 SOLUTION FOR GSM WIRELESS CARRIERS

Geometrix enhancement addresses the expanding role of GSM in the United States and enables GSM carriers to meet Federal Communications Commission E911 Phase II requirements

RESTON, VA, January 29, 2001 - Grayson Wireless, a division of Allen Telecom Inc. (NYSE:ALN), announced that the company's Geometrix® wireless location systems group is in the process of developing an E911 caller location solution for GSM, in addition to the CDMA, TDMA, AMPS and iDEN wireless air interfaces already available.

The development schedule for the Geometrix GSM solution targets availability for deployment in the second quarter of 2001. The addition of a GSM wireless air interface to the existing systems would allow GSM carriers to meet the FCC's E911 Phase II implementation schedule. The GSM solution is expected to be available in new Geometrix systems as well as for existing systems as a software download without additional hardware.

"With the addition of a GSM air interface, Geometrix would become the only network based wireless location system compatible with all air interfaces utilized by the commercial carriers in the United States," said Tom Gravely, Grayson Wireless' Vice President of Engineering. As a result, Gravely noted, Geometrix could offer the following benefits:

- The Geometrix system could support any and all combinations of wireless air interfaces in all frequency ranges used by cellular and PCS carriers. Common system modules would be able to provide flexibility with no duplication of equipment.
- In addition to satisfying the FCC's E911 Phase II requirements, carriers implementing Geometrix would have the system performance necessary to offer location-sensitive value-added services.
- Carriers that implement the Geometrix system will not have to convert or replace any customer handsets in order to satisfy Phase II requirements.

Although GSM is the standard in Europe and widely deployed internationally, its role in the United States has been relatively minor until recent carrier announcements indicated that its use here could accelerate dramatically.

Grayson Wireless' development and marketing of an existing GSM test and measurement equipment line has contributed significantly to the company's expectations on the timing for delivery of a GSM wireless location solution.

Allen Telecom's Grayson Wireless division designs, manufactures and markets the Geometrix system, a state-of-the-art, scalable, cost-effective, network overlay solution intended to allow carriers to meet the FCC's stringent requirements for wireless E911 caller location. Geometrix currently supports the vast



majority of wireless phones in use in the United States. Geometrix can also provide caller-locating support for a wide variety of location-based value-added services.

Allen Telecom Inc. (<a href="http://www.allentele.com">http://www.allentele.com</a> is a leading supplier of wireless equipment to the global telecommunications infrastructure market. Grayson Wireless supplies measurement and signal processing systems for testing the performance of wireless networks, network-based wireless caller geolocation systems for E911 and value-added services. FOREM supplies sophisticated filters, duplexers, combiners, amplifiers and microwave radios to an array of OEM customers. MIKOM focuses on providing repeaters, in-building systems and other products that enhance both the coverage and capacity of a wireless system. Tekmar Sistemi provides integrated low power fiber optic and cable distributed antenna systems for indoor coverage systems. Decibel Products and Antenna Specialists manufacture land based and mobile antennas in frequency bands that cover all of the traditional wireless networks. Comsearch offers engineering and consulting services for wireless operators.

Statements included in this press release, which are not historical in nature, are forward-looking statements made pursuant to the safe harbor provisions of the Private Securities Litigation Reform Act of 1995. Forward-looking statements regarding the Company's future performance and financial results are subject to a number of risks and uncertainties that could cause actual results to differ materially from those set forth in the forward-looking statements. Factors that could cause the Company's actual results to materially differ from forward-looking statements made by the Company, include, among others, the cost, success and timetable for new product development, including specifically products for 3G, E911 and power amplification, the health and economic stability of the world and national markets, the availability of capital and financing to the wireless carriers, the uncertain timing and level of purchases of both current products and those under development for current and prospective customers of the Company's products and services, the impact of competitive products and pricing in the markets, the future utilization of the Company's tax loss carry forwards, the impact of U.S. and foreign government legislative/regulatory actions, including, for example, the scope and timing of E911 geolocation requirements in the U.S. markets and spectrum availability and licensing for new wireless applications, and the cost and availability of financing for customers of the Company's geolocation projects. Allen Telecom Inc.'s Annual Report on Form 10-K and Quarterly Reports on Form 10-Q contain additional details concerning these factors.

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